

OCT 15 1990

JOSEPH F. SPANIOL, JR.
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No. 90-458

IN THE
SUPREME COURT OF THE UNITED STATES
OCTOBER TERM, 1990

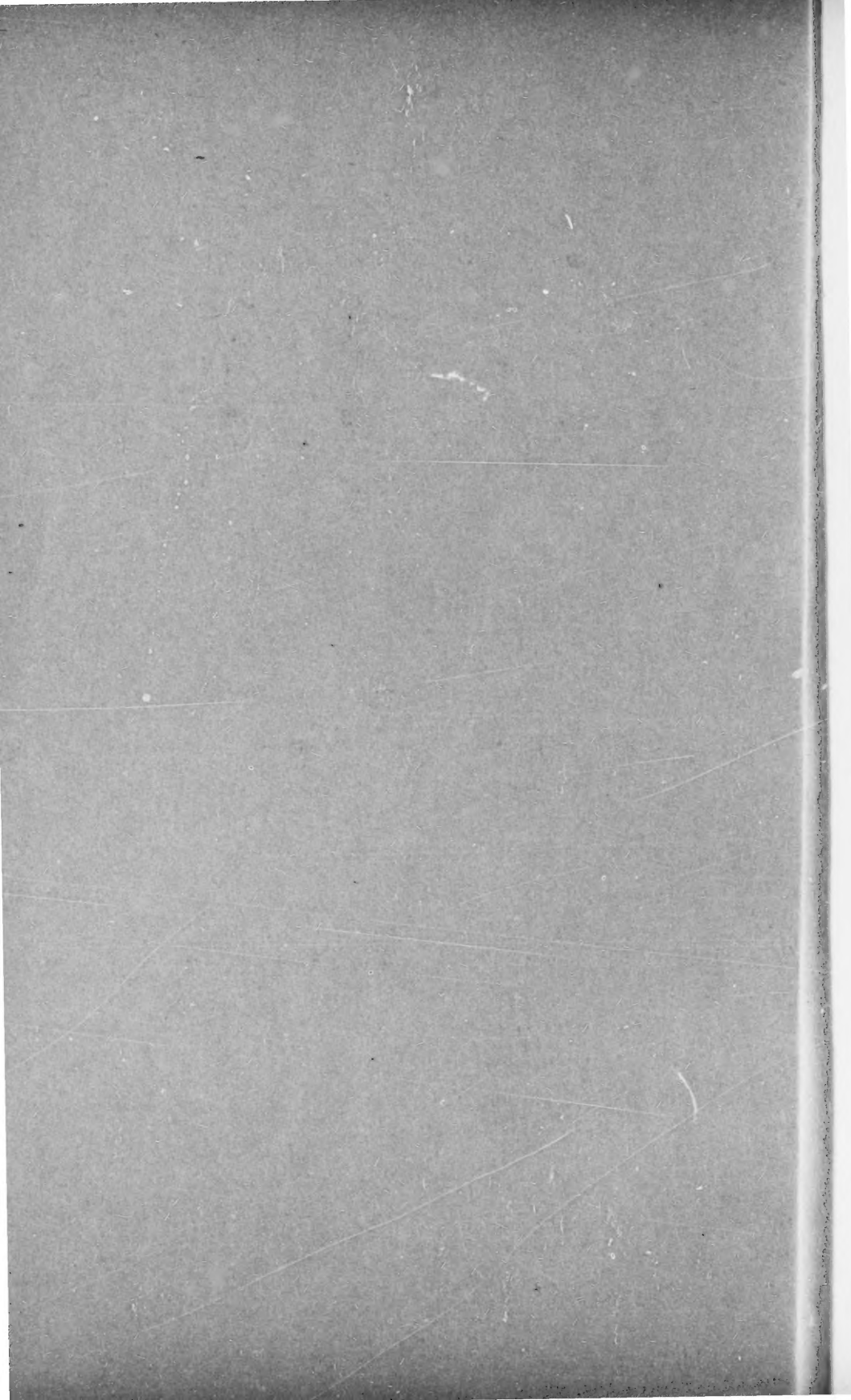
FRANK J. CAMOSCIO,
PETITIONER,
VS.
THE PATRIOT LEDGER, ET AL.,
RESPONDENTS.

ON PETITION FOR A WRIT OF CERTIORARI
TO THE
SUPREME JUDICIAL COURT OF MASSACHUSETTS

BRIEF FOR PETITIONER IN REPLY

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QUESTION PRESENTED

A. THE RESPONDENT ADMITTED THAT THE STORY IN QUESTION WAS FALSE, THEREFORE, THE PETITIONER IS ENTITLED TO DAMAGES.

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ARGUMENTS

I. NEWSPAPER KNOWINGLY WROTE A FALSE

STORY, THEREFORE, NOT ENTITLED TO
IMMUNITY.

This case gives the court an opportunity to delineate when a newspaper is entitled to "reporters privilege" versus libel for knowingly printing a false story. This case affects the masses because it makes newspapers responsible to print the truth only. This case would set guidelines for every newspaper in the country.

In the petitioner's original certiorari to this court, James C. Heigham, attorney for the respondents, was quoted admitting to the fact that the story in question was false. See page 4 of the petitioner's Writ of Certiorari. The respondents neither deny in their Brief for Respondents In Opposition to Petition that they knowingly published a false article nor do

they deny that they refused to print the truth because it would offend state officials.

The petitioner, therefore, states that the newspaper and its political friends benefitted by knowingly publishing a false story about the petitioner.

The petitioner has been stalled by the Supreme Judicial Court of Massachusetts from hearing his Petition for Equity concerning his license revocation until after the November elections. The issue of libel-proof cannot apply in this case since the respondents knew that the petitioner's podiatric license was removed fraudulently because the petitioner had previously given them proof. The Attorney General for Massachusetts has chosen not to file a brief nor to oppose the Petition for Equity.



II.

CONCLUSION

The court must allow the Writ of Certiorari, otherwise, newspapers would be allowed to print false stories to cover-up corrupt injustices of their political friends. There is no question that the respondents knew that they printed a false story and that they refused to print the truth, therefore, forcing the petitioner to seek a legal remedy.

Respectfully submitted,

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Boston, Massachusetts 02113

DATED: October 15, 1990

Domenic Bruno
NOTARY PUBLIC

My Commission Expires May 29, 1992

Domenic Bruno
10/15/90

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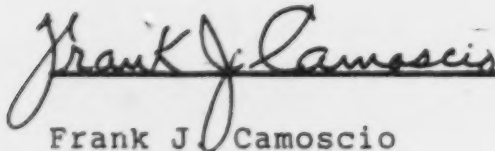
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CERTIFICATE OF SERVICE

I hereby certify that three copies of the foregoing Brief for Petitioner in Reply were mailed to James C. Heigham, of Choate, Hall & Stewart, 53 State Street, Boston, Massachusetts 02109.

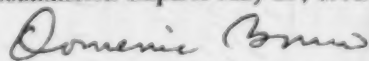
I hereby certify that all the statements contained in my Certificate of Service are true and are made under the pains and penalties of perjury.



Frank J. Camoscio
Pro Se

—, Domenic Bruno
NOTARY PUBLIC

My Commission Expires May 29, 1992


10/15/90